

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

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IRON MOUNTAIN INCORPORATED;  
IRON MOUNTAIN INFORMATION  
MANAGEMENT, INC.; C. RICHARD  
REESE; JOHN F. KENNY, JR.; GARRY  
B. WATZKE; LARRY L. VARN; and  
CHARLES G. MOORE,

Plaintiffs,

v.

THOMAS CARR,

Defendant and  
Counter-Plaintiff,

v.

IRON MOUNTAIN INCORPORATED;  
IRON MOUNTAIN INFORMATION  
MANAGEMENT, INC.; C. RICHARD  
REESE; JOHN F. KENNY, JR.; GARRY  
B. WATZKE; LARRY L. VARN; and  
CHARLES G. MOORE,

Counter-Defendants.

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Civil Action No. 05 10890 RCL

**MOTION TO CONTINUE SCHEDULING CONFERENCE**

Plaintiffs Iron Mountain Incorporated, Iron Mountain Information Management, Inc.,  
C. Richard Reese, and Larry L. Varn (collectively, the "Plaintiffs")<sup>1</sup> hereby respectfully request  
that the Court continue the scheduling conference set for May 31, 2006 (the "Scheduling

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<sup>1</sup> On March 31, 2006, the court adopted the reports and recommendations of Magistrate Judge Collings granting in part and denying in part motions to dismiss filed in this action. As a result, all counterclaims against plaintiffs John F. Kenny, Jr., Garry B. Watzke, and Charles G. Moore have been dismissed.

Conference”) in this action. Until the pending motion to dismiss in a related action that has been consolidated with this action has been decided and the pleadings are closed, it is not practical or efficient for the court or the parties to conduct the required activities or issue the required orders associated with the Scheduling Conference and as required by the applicable rules.

A memorandum of law in support of this motion is filed herewith.

**WHEREFORE**, the Plaintiffs respectfully request that the Court continue the Scheduling Conference until the motion to dismiss the counterclaims in the related and consolidated action is decided and all pleadings are closed.

**IRON MOUNTAIN INCORPORATED,  
IRON MOUNTAIN INFORMATION  
MANAGEMENT, INC., C. RICHARD  
REESE, and LARRY L. VARN**

By their attorneys,

April 20, 2006

/s/ Ira K. Gross

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**Local Rule 7.1 Certificate**

I certify that on April 20, 2006, I contacted Defendant's counsel to confer and have attempted in good faith to resolve or narrow the issues. Defendant's counsel did not assent to this motion.

/s/ Samuel A. Miller

**Certificate of Service**

I certify that this **Motion to Continue Scheduling Conference** filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on April 20, 2006.

/s/ Samuel A. Miller